

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

DINÉ CITIZENS AGAINST RUINING OUR)	
ENVIRONMENT, <i>et al.</i> ;)	
)	Case No. 1:19-cv-00703
Plaintiffs,)	
)	
v.)	PLAINTIFFS’ MOTION FOR
)	TEMPORARY RESTRAINING
DAVID BERNHARDT, <i>et al.</i> ;)	ORDER AND PRELIMINARY
)	INJUNCTION
Federal Defendants.)	
)	

Diné Citizens Against Ruining Our Environment, San Juan Citizens Alliance, Sierra Club and WildEarth Guardians (collectively “Citizen Groups”) move for a temporary restraining order (“TRO”) and preliminary injunction pursuant to Fed R. Civ. P 65(b), respectfully requesting that the court enjoin Federal Defendants from allowing any ground disturbance, construction, oil and gas drilling, and oil and gas production on the 255 applications for permits to drill (“APDs”) challenged in this case pending resolution of this case on the merits to maintain the status quo on the ground. This Motion is supported by Plaintiffs’ Memorandum in Support, and associated declarations and exhibits attached thereto, pursuant to Fed. R. Civ. P. 65(a).

Plaintiffs’ counsel has communicated to Federal Defendants’ counsel their intent to file this motion. On July 24, 2019, Plaintiffs traveled to BLM’s New Mexico State offices in Santa Fe to discuss a possible settlement. On Monday, July 29 Federal Defendants communicated to Plaintiffs that they intend to move forward with APD approvals and ground disturbing activities and drilling on the APDs challenged in this case. Plaintiffs therefore respectfully request that this Court grant the Motion pursuant to Fed R. Civ. P 65(b) maintaining the status quo and enjoining Federal Defendants from authorizing any activities on the challenged APDs.

Respectfully submitted this 1st day of August 2019,

/s/ Kyle J. Tisdel

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/s/ Karimah Schoenhut

Karimah Schoenhut (D.C. Bar No. 1028390)
(appearing by association with Federal Bar
member Kyle J. Tisdel pursuant to L.R. 83.3(a))

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing MOTION FOR A TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION was served on all counsel of record through the Court's ECF system on this 1st day of August 2019.

/s/ Kyle Tisdell